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Attorney for Defendant Eric Lee Flores

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION**

UNITED STATES OF AMERICA,

Case No. 3:16-CR-00051-25-BR

Plaintiff,

v.

**DECLARATION OF
ERNEST WARREN, JR.
UNOPPOSED MOTION
FOR A CONTINUANCE
OF TRIAL DATE AND
TO FILE MOTIONS**

ERIC LEE FLORES,

Defendant.

I, Ernest Warren, Jr., do depose and say:

1. I was appointed to represent defendant Eric Lee Flores on March 17, 2016, by the Honorable Anna Brown.

2. This is defendant's first request to continue the trial date.

3. The parties have discussed the fact that there are thousands of pages of discovery as well as videos and images. Defense Counsel needs time to review discovery, follow investigation leads, prepare and file motions, and advise the defendant on legal matters

4. Assistant United States Attorney Craig Gabriel does object to this request.

5. I, therefore, would request the Court to grant Motion for a Continuance of Trial until after December 6, 2016 because of upcoming appearances including two murder trials

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before that date. State of Oregon v. Michael Lawson; Case Number 15-CR-26804; and trial date September 12, 2016 through September 22, 2016. State of Oregon v. Leo Lee Burns; Case Number 15-CR-50276; and trial date November 9, 2016 through November 18, 2016.

DATED this 8 day of April, 2016.

RESPECTFULLY SUBMITTED,

/s/ Ernest Warren, Jr.

Ernest Warren, Jr. OSB No. 891384
Attorney for defendant

CERTIFICATE OF SERVICE

I hereby certify that I have served a certified true copy of the MOTION TO CONTINUE TRIAL DATE AND DECLARATION IN SUPPORT OF MOTION TO CONTINUE TRIAL DATE in the attached matter upon the parties listed below by notice of electronic filing using the CM/ECF System as follows:

Ethan D. Knight
Craig J. Gabriel
Geoffrey A. Barrow
U.S. Attorney's Office
District of Oregon
1000 S.W. Third Avenue
Suite 600
Portland, OR 97204
503-727-1118
Fax: 503-727-1117

and filed the original with the Court on the date listed below.

DATED this 8 day of April, 2016.

WARREN & SUGARMAN

/s/Ernest Warren, Jr.
Ernest Warren, Jr. OSB No. 891384
Attorney for Defendant